

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARGARET A. ROBISON

Plaintiff(s),

v. CONCORD MANAGEMENT &
MEADOWOOD PARK Apartments

Case:2:14-cv-14808

Judge: Cohn, Avern

MJ: Hluchaniuk, Michael J.

Filed: 12-17-2014 At 11:16 AM

CMP ROBISON V CONCORD MANAGEMENT, E
T AL (EB)

Defendant(s).

COMPLAINT

- I. Defendant(s). Print the full name for each defendant. If there are more defendants, use additional pages to provide their names.

Name of Defendant(s)

1.

2.

3.

4.

5.

- II. Statement of claim. Briefly state the facts of your case. Describe how each defendant is involved, and exactly what each defendant did, or failed to do. Include names of any other persons involved, dates, and places. You may use additional paper if necessary.

Please see attached

III. Relief. Briefly state exactly what you want the court to do for you.

- 1) AWARD Damages in excess of \$100,000 for the violations specified in the Complaint.
- 2) Enter an order requiring Defendants to maintain the parking accommodation for so long as I am a resident.

IV. Additional Information. – Briefly enter any additional information, you may use additional paper.

V. Demand for Jury Trial. Check this box if you want your case to be decided by a jury, instead of a judge.

☒ Plaintiff demands a jury trial on all issues.

Dated:

December 15, 2014

Margaret A. Robinson

Plaintiff's Signature

MARGARET A. ROBINSON

Plaintiff's Printed Name

27084 MEADOWOOD DR #203

Street Address

WIXOM MI 48393

City, State, Zip Code

248.773.7790

Telephone Number

MAR62253@AOL.COM

E-mail Address

U.S. District Court
Eastern District of Michigan
Theodore Levin U.S. Courthouse
231 West Lafayette Blvd.
Detroit, Michigan 48226

MARGARET A. ROBISON

Plaintiff,

Case No.:
HON:

vs.

CONCORD MANAGEMENT &
MEADOWOOD PARK APARTMENTS

Defendants

Margaret A. Robison, (Plaintiff) 27084 Meadowood Drive #203 Wixom, Michigan 48393. Concord Management Limited, 21800 Haggerty Road, Suite #220, Northville, Michigan 48167. Concord Management/Meadowood Park Apartments 1551 Sandspur Maitland, Florida 32751(Defendants) and Meadowood Park Apartments, 27059 Meadowood Drive, Wixom, Michigan 48393 (Defendants).

1).On November 15, 2013 9:30p.m., after meeting with Representative Klint Kesto, I came home to find another tenant parked in my “reserved” (not handicapped) parking space. Margaret A. Robison called maintenance man, Mr. George Moses, to come and get the tenant to move their car. Mr. George Moses also had to call Ms. Lisa Osler (manager) to find out whom the car belong to. The tenant was upset at Margaret A. Robison for having her to move her car in a “reserved” spot. Mr. George Moses then stated to Margaret A. Robison, “You have to play nice with the new neighbor.” Margaret A. Robison has been denied at every requests for a “handicapped parking sign for resident only” with permit because Concord Management stated that the sign is “illegal” to have.

2).Concord Management have ignored all Margaret A. Robison requests for handicapped parking where she could be safe and protected by the police/law. Concord Management requested that she pay from \$250.00 to \$1,000 to \$1,600 depending on the season for a curb cut-out. Without handicapped parking, it put Margaret A. Robison safety at risk.

3).According to the City of Wixom, Mr. Dennis Smith, Building Inspector, there should have been handicapped accessibility for 27084-203 building according to the Disability Act of 1976. The original design was approved to have handicapped parking at 27084-203 entrance. Any changes that Concord Management made after, should have gone back to the city of Wixom for approval, and they did not. Concord Management failed all guidelines according to local, state and federal law. Margaret A. Robison is a resident of Wixom and must follow all the ordinances and laws, therefore, Margaret A. Robison should also be protected too, by all the ordinances and laws by the city of Wixom.

4).Concord Management and Meadowood Park Apts., went against Margaret A. Robison privacy rights. According to the guidelines, all Concord Management needed from Margaret A. Robison for handicapped parking, was the blue handicapped placard (in which they had in 2008 and ran it through the state of Michigan for verification). Concord Management forced Margaret A. Robison to reveal medical records on why she is handicapped. December 4, 2013 Robert Shaner, Chiropractor, had to reveal Margaret A. Robison disability impairments. December 2, 2013 Sean P. Coyle, M.D., had to reveal Margaret A. Robison disability impairments. Margaret A. Robison has been disabled since 1990.

5).As a result, Concord Management and Meadowood Park Apts. failed to protect and provide according the Disability Act of 1976, Elliott Larsen Act, Fair Housing Act, the harassment towards Margaret A. Robison should have never happened. Margaret A. Robison could not enjoy the living accommodation as other tenants. Margaret A. Robison was constantly harassed by deliveries, tenants, moving companies, any time that she left her apartment.

Wherefore, Plaintiff Margaret A. Robison demands a judgment against Defendants, Concord Management and Meadowood Park Apartments, for damages in excess of \$100,000 plus court costs, permanent handicapped parking with permit as long as she resides at Meadowood Park Apts., for zero tolerance of harassment towards a handicapped disabled women, failure to provide accommodation(housing), HIPPA violations.

dated: December 15, 2014

Respectfully submitted,

Margaret A. Robison
Margaret A. Robison, Plaintiff's
signature

MARGARET A. ROBISON
Plaintiff's printed name

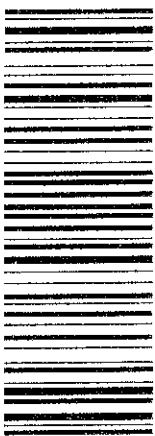
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FILED
DEC 17 2014
CLERKS OFFICE-DETROIT
U.S. DISTRICT COURT

Intake

7014 0510 0000 1235 0661



U.S. District Court

Eastern District of Michigan

Arthur Owen U.S. Courthouse

231 W. Lafayette Blvd

Detroit Michigan

48226

Attn: Mr. Kevin Wacker - Court Admin.

Clerk of Court



1300



48226

U.S. POSTAGE
PAID
WIXOM MI
48393
DEC 15, 14
AMOUNT

\$9.08
00057861-04

New LawsUIT Check List

Instructions: Put a check mark in the box next to each appropriate entry to be sure you have all the required documents.

| | | |
|-------------------------------------|---|---|
| <input checked="" type="checkbox"/> | Two (2) completed Civil Cover Sheets. | <p>Case: 2:14-cv-14808 Judge: Cohn, Avern MJ: Hluchaniuk, Michael J. Filed: 12-17-2014 At 11:16 AM CMP ROBISON V CONCORD MANAGEMENT, E T AL (EB)</p> |
| <input checked="" type="checkbox"/> | <p>Enter the number of defendants named in your lawsuit in the blank below, add 2 and then enter the total in the blank.</p> <div style="display: flex; align-items: center; margin-top: 10px;"> <div style="text-align: center; margin-right: 10px;"> <u>2</u> <small># of Defendants</small> </div> <div style="margin: 0 10px;">+ 2 =</div> <div style="text-align: center; margin-right: 10px;"> <u>4</u> <small>Total</small> </div> <div> Complaints. </div> </div> <p>Received by Clerk: <u>EB</u> Addresses are complete: <u>✓</u></p> | |

| | |
|--------------------------|--|
| <input type="checkbox"/> | <p>If any of your defendants are government agencies: Provide two (2) extra copies of the complaint for the U.S. Attorney and the Attorney General.</p> |
|--------------------------|--|

| | |
|-------------------------------------|--|
| If Paying The Filing Fee: | If Asking That The Filing Fee Be Waived: |
| <input type="checkbox"/> | <p>Current new civil action filing fee is attached.</p> <p>Fees may be paid by check or money order made out to:</p> <p style="text-align: center;"><i>Clerk, U.S. District Court</i></p> <p>Received by Clerk: _____ Receipt #: _____</p> |
| <input checked="" type="checkbox"/> | <p>Two (2) completed Application to Proceed in District Court without Prepaying Fees or Costs forms.</p> <p>Received by Clerk: <u>EB</u></p> |

Select the Method of Service you will employ to notify your defendants:

| | | |
|--|--|--|
| Service via Summons by Self | Service by U.S. Marshal <small>(Only available if fee is waived)</small> | Service via Waiver of Summons <small>(U.S. Government cannot be a defendant)</small> |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>Two (2) completed summonses for each defendant including each defendant's name and address.</p> <p>Received by Clerk: <u>EB</u></p> | <p>Two (2) completed USM – 285 Forms per defendant, if you are requesting the U.S. Marshal conduct service of your complaint.</p> <p>Two (2) completed Request for Service by U.S. Marshal form.</p> <p>Received by Clerk: <u>NO</u></p> | <p>You need not submit any forms regarding the Waiver of Summons to the Clerk.</p> <p><u>Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:</u></p> <ul style="list-style-type: none"> One (1) Notice of a Lawsuit and Request to Waive Service of a Summons form per defendant. Two (2) Waiver of the Service of Summons forms per defendant. <p>Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.</p> |

Clerk's Office Use Only

Note any deficiencies here:

Civil cover sheet unsigned

CIVIL COVER SHEET

County in which action arose

OAKLAND

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

MARGARET A. ROBISON

(b) County of Residence of First Listed Plaintiff OAKLAND
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

DEFENDANTS

CONCORD MANAGEMENT PHEASANTWOODS
PARK APARTMENTSCounty of Residence of First Listed Defendant Wayne, Michigan

(MULTI PLAINTIFF CASES ONLY)

Case: 2:14-cv-14808

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T AL (EB)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTES | |
|---|--|--|---|---|--|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice | PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input checked="" type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education | PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement | | | |

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

AMERICAN'S W/ DISABILITIES ACT, HIPAA

Brief description of cause:

FAILURE TO PROVIDE ACCOMMODATIONS (HOUSING) - HIPAA VIOLATIONS

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$100,000+

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

1. Is this a case that has been previously dismissed?

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes
☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :
